

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

7/13/2021

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UNITED STATES OF AMERICA

- v. -

ANDRE LITTLE,

Defendant.  
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CONSENT PRELIMINARY ORDER  
OF FORFEITURE/  
MONEY JUDGMENT

19 Cr. 276 (NSR) - 02

WHEREAS, on or about April 18, 2019, ANDRE LITTLE (the "Defendant"), and another, was charged in a four-count Indictment, 19 Cr. 276 (NSR) (the "Indictment"), with Hobbs Act robbery conspiracy, in violation of Title 18, United States Code, Section 1951 (Count One); Hobbs Act robbery, in violation of Title 18, United States Code, Section 1951 and 2 (Count Two); narcotics conspiracy, in violation of Title 21, United States Code, Section 846 (Count Three); and possession of a firearm in furtherance of a drug trafficking crime, in violation Title 18, United States Code, Sections 924 (c)(1)(A)(i) and 2 (Count Four);

WHEREAS, the Indictment included a forfeiture allegation as to Counts One and Two of the Indictment seeking forfeiture to the United States as a result of the commission of the offenses charged in Counts One and Two of the Indictment;

WHEREAS, the Indictment included a second forfeiture allegation as to Count Three of the Indictment, seeking forfeiture to the United States, pursuant to Title 21, United States Code, Section 853 of any and all property, constituting or derived from any proceeds obtained, directly or indirectly as a result of the offense charged in Count Three of the Indictment, and any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the offense charged in Count Three of the Indictment, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of the offense charged in Count Three of the Indictment that the Defendant personally obtained;

WHEREAS, on or about October \_\_\_\_, 2020, the Defendant pled guilty to Counts One and Three of the Indictment, pursuant to a plea agreement with the Government, wherein the Defendant admitted the forfeiture allegation with respect to Counts One and Three of the Indictment and agreed to forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c): (i) a sum of money representing proceeds traceable to the commission of the offense charged in Count One of the Indictment; and pursuant to Title 21, United States Code Section 853: (ii) a sum of money equal to \$6,000 in United States currency, representing proceeds traceable to the commission of the offense charged in Count Three of the Indictment;

WHEREAS, the Defendant consents to the entry of a money judgment in the amount of \$6,000.00 in United States currency representing the amount of proceeds traceable to the offenses charged in Count Three of the Indictment that the Defendant personally obtained; and

WHEREAS, the Defendant admits that, as a result of acts and/or omissions of the Defendant, the proceeds traceable to the offenses charged in Counts One and Three of the Indictment that the Defendant personally obtained cannot be located upon the exercise of due diligence.

IT IS HEREBY STIPULATED AND AGREED, by and between the United States of America, by its attorney Audrey Strauss, Acting United States Attorney, Assistant United States Attorney, Samuel L. Raymond of counsel, and the Defendant, and his counsel, Daniel Hochheiser, Esq., that:

1. As a result of the offenses charged in Counts One and Three of the Indictment, to which the Defendant pled guilty, a money judgment in the amount of \$6,000.00 in United States currency (the "Money Judgment"), representing the amount of proceeds traceable to

the offenses charged in Count Three of the Indictment that the Defendant personally obtained, shall be entered against the Defendant.

2. Pursuant to Rule 32.2(b)(4) of the Federal Rules of Criminal Procedure, this Consent Preliminary Order of Forfeiture/Money Judgment is final as to the Defendant, ANDRE LITTLE, and shall be deemed part of the sentence of the Defendant, and shall be included in the judgment of conviction therewith.

3. All payments on the outstanding money judgment shall be made by postal money order, bank or certified check, made payable, in this instance, to the United States Marshals Service, and delivered by mail to the United States Attorney's Office, Southern District of New York, Attn: Money Laundering and Transnational Criminal Enterprises Unit, One St. Andrew's Plaza, New York, New York 10007 and shall indicate the Defendant's name and case number.

4. The United States Marshals Service is authorized to deposit the payments on the Money Judgment in the Assets Forfeiture Fund, and the United States shall have clear title to such forfeited property.

5. Pursuant to Title 21, United States Code, Section 853(p), the United States is authorized to seek forfeiture of substitute assets of the Defendant up to the uncollected amount of the Money Judgment.

6. Pursuant to Rule 32.2(b)(3) of the Federal Rules of Criminal Procedure, the United States Attorney's Office is authorized to conduct any discovery needed to identify, locate or dispose of forfeitable property, including depositions, interrogatories, requests for production of documents and the issuance of subpoenas.

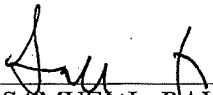
7. The Court shall retain jurisdiction to enforce this Consent Preliminary Order of Forfeiture/Money Judgment, and to amend it as necessary, pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure.

8. The Clerk of the Court shall forward three certified copies of this Consent Preliminary Order of Forfeiture/Money Judgment to Assistant United States Attorney Alexander J. Wilson, Co-Chief of the Money Laundering and Transnational Criminal Enterprises Unit, United States Attorney's Office, One St. Andrew's Plaza, New York, New York 10007.

9. The signature page of this Consent Preliminary Order of Forfeiture/Money Judgment may be executed in one or more counterparts, each of which will be deemed an original but all of which together will constitute one and the same instrument.

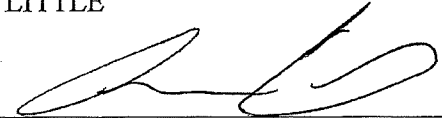
AGREED AND CONSENTED TO:

AUDREY STRAUSS  
Acting United States Attorney for the  
Southern District of New York


By:   
SAMUEL L. RAYMOND  
Assistant United States Attorney  
One St. Andrew's Plaza  
New York, NY 10007  
(212) 637-6519

10/29/2020  
DATE

ANDRE LITTLE

By:   
ANDRE LITTLE

10-29-20  
DATE

By:   
DANIEL HOCHHEISER, ESQ.  
Attorney for Defendant

10-29-20  
DATE

SO ORDERED:

  
HONORABLE NELSON S. ROMAN  
UNITED STATES DISTRICT JUDGE

July 13, 2021  
DATE